

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

YVETTE LOCKHART-BEMBERY,

Plaintiff

v.

TOWN OF WAYLAND POLICE DEPARTMENT,
ROBERT IRVING, in his capacity as CHIEF OF
THE WAYLAND POLICE DEPARTMENT and
DANIEL SAURO,

Defendants

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* **C.A. NO. 04-10581-NMG**

MOTION FOR INDIVIDUAL VOIR DIRE

Now comes the plaintiff and moves this Honorable Court allow individual voir dire of each potential juror. As reason the plaintiff states that individual voir dire will allow the parties to more accurately assess the potential jurors' suitability for service on the jury. Allowing individual questioning will result in a more rigorous screening process in which jurors will have difficulty hiding any bias that would not be apparent from a group voir dire.

As further reason, the plaintiff states that as this case involves issues of race, individual voir dire will allow the parties to more accurately assess the potential juror's individual biases on the issue of race, something unlikely to be revealed by a juror during the course of groups voir dire.

Individual voir dire will result just possessing less bias than one screened through group voir dire. Individual voir dire will result in a fair trial untainted by individual biases.

Plaintiff by counsel,

Date: 01/26/2006

/s/ Andrew M. Fischer
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